

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

SWISSDIGITAL USA CO., LTD.

*Plaintiff,*

v.

SAMSONITE INTERNATIONAL S.A.;  
SAMSONITE LLC; SAMSONITE  
COMPANY STORES, LLC; and DIRECT  
MARKETING VENTURES, LLC;

*Defendants.*

Civil Action No. 1:24-cv-11636

**JURY TRIAL DEMANDED**

**MOTION FOR ADMISSION *PRO HAC VICE* OF DARIUSH KEYHANI, FRANCES H.  
STEPHENSON, AND SCOTT M. DRAFFIN**

Pursuant to Local Rule 83.5.3 and the enclosed certifications, counsel for Plaintiff Swissdigital USA Co., Ltd. (“Swissdigital”) moves for the admissions, *pro hac vice*, of Dariush Keyhani, Frances H. Stephenson, and Scott M. Draffin of Keyhani LLC to represent Swissdigital as lead counsel in the above-captioned matter.

Date: June 26, 2024

Respectfully submitted,

/s/ Kevin R. Mosier

Lisa M. Tittlemore (BBO # 567941)

Kevin R. Mosier (BBO # 703739)

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Dariusz Keyhani (D.C. Bar No. 1031500)  
Frances H. Stephenson (New York Reg. No.  
5206495)  
Scott M. Draffin (New York Reg. No. 6095988)  
**KEYHANI LLC**  
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*ATTORNEYS FOR PLAINTIFF, SWISSDIGITAL  
USA CO., LTD.*

**CERTIFICATION**

Pursuant to Local Rule 83.5.3, I certify that I am eligible for admission to this Court and that I am admitted, practicing, and in good standing as a member of the Bar of the District of Columbia where I am not subject to any pending disciplinary proceedings. I also certify that I have not previously had any *pro hac vice* admission to this court revoked for any reason, and that I have read and will comply with the Local Rules of this Court. In accordance with Local Rule 83.5.3(e)(4) and the District Court Fee Schedule, I further certify that the fee of \$125.00 has been paid to the Clerk of Court, or, if not paid previously, the fee payment will be submitted to the Clerk's Office upon the filing of this motion.

/s/ Dariush Keyhani

Dariush Keyhani  
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[dkeyhani@keyhanillc.com](mailto:dkeyhani@keyhanillc.com)

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/s/ Frances H. Stephenson

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/s/ Scott M. Draffin

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